Homeland Security | CFATS Knowledge Center

FAQ Number: 1490	**Date Published:** June 24, 2008	**Last Updated:** April 13, 2016

Question: Do all of the employees involved in filling out the Security Vulnerability Assessment (SVA) at my facility have to be Chemical-terrorism Vulnerability Information (CVI) Authorized Users?

Answer: No. It depends on the role the employee has with regards to the SVA development.

Any employee requiring a Chemical Security Assessment Tool (CSAT) account to input data regarding the Top-Screen, SVA, or Site Security Plan (SSP) on behalf of the chemical facility will need to be a CVI Authorized User. When any part of CSAT is filled in, it contains CVI regulated information pursuant to 6 C.F.R. § 27.400. Thus, any person who actually fills out any part of the Top-Screen, SVA, or SSP, reviews them, or handles them (including Preparers, Submitters, Reviewers, and Authorizers) must be a CVI Authorized User (i.e., trained and certified by DHS) and have a "need to know" in accordance with 6 CFR § 27.400(e). See CVI Procedural Manual available at https://www.dhs.gov/publication/safeguarding-information-cvi-manual.

However, only information developed, submitted, or maintained in order to comply with the Chemical Facility Anti-Terrorism Standards (CFATS) or its authorizing statute is considered CVI. See 72 Fed. Reg. 17715 (April 9, 2007). Therefore, some of the underlying, existing information included in CSAT may not be CVI in and of itself. In particular, factual information required by another federal program, or information developed for business purposes unrelated to CFATS, may not be CVI apart from its actual inclusion in a Top-Screen, SVA, or SSP. Employees who provide that non-CVI data to others preparing the Top-Screens, SVAs, or SSPs do not need to be CVI Authorized Users.

For additional assistance in determining whether employees need to be CVI Authorized Users in specific circumstances, please contact the CFATS Help Desk at 866-323-2957.

Additional information on CVI procedures and CVI training can be found in the CVI Procedural Manual, available at https://www.dhs.gov/publication/safeguarding-information-cvi-manual.

Note: Any references to SSPs include the Alternative Security Program (ASP) and the Expedited Approval Program (EAP).